

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☐ Record 1 of 1

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Dear Sirs:

With regard to WT Docket No. 98-143, 1998 Biennial Regulatory Review -- Amendment of Part 97 of the Commission's Amateur Service Rules, I wish to make the following comments:

I am an Amateur Radio Volunteer Examiner. I conduct classes in introductory radio theory and Morse Code for those interested in obtaining their Novice and Technician licenses.

In general, I believe that all applicants should be required to demonstrate a more thorough knowledge of the radio theory than is currently required in the existing Amateur examinations at all levels. I feel that the recent trend has been to relax the level of real knowledge needed to obtain the various Amateur Radio licenses. If the amateur service is to continue to fulfil its role as a place for the development of "the radio art," this must not continue.

The Amateur service is somewhat different from other hobby activities because it requires that its practitioners obtain a federal license in order to pursue their interests. Such a license implies that in exchange for privileges granted, a certain return must be made to the Amateur service. Amateurs have a tradition of both unstinting public service, particularly in times of emergency or natural disaster, and of advancing radio techniques and knowledge through their understanding of, and experimentation in the art of radio communication.

I agree that the current License Class Structure contains redundant and overlapping licenses and should be simplified. I believe this can be best accomplished by the re-establishment of just three (3) classes of Amateur Radio License: Technician, General, and Advanced. I support the contention that the Novice License has been supplanted by the current Technician Class license as the entry-level Amateur license.

I feel that because this license class grants privileges on all bands above 30 MHz, the question pool should be amended to include more questions pertaining to the characteristics of each of these VHF, UHF and SHF bands. Questions should be included to test knowledge of propagation, antennas, emission types, RF safety issues, repeater operation, accepted band plans already in place, satellite operation, packet and other digital modes, and Amateur Radio's tradition as a "gentleman's" radio service.

I propose an examination consisting of 60 to 75 questions to show that the applicant has adequate knowledge in these areas. Because these bands are also the most frequently used during emergencies or local disasters, I feel that additional material needs to be introduced to address appropriate ways Amateurs can interact with local authorities to provide emergency communications and support.

I feel that the entry-level license class granting HF privileges should be termed General Class. All current holders of a Novice or Technician-Plus license should be grandfathered into the new General class. This license class

should require the applicant to demonstrate knowledge of the characteristics of the HF bands from 160 through 10 meters. Current Novice CW bands should be absorbed into the General bands, with no restriction on power.

Propagation characteristics, influence of sunspots and other electro-magnetic phenomena on the HF bands, emission types, elementary receiver and transmitter theory, modulation techniques, elementary antenna theory, RF safety issues, installation and station operation should all be required material for this class.

Particular stress should be placed upon being a competent, courteous operator. Accepted band plans, and the repeated emphasis on Amateur radio as a "gentleman's" service should be a prominent part of the requirements for this license class. An examination consisting of 30 to 45 questions seems adequate to test for this knowledge. Prerequisite for this license would be the possession of a valid Technician class license. Band limits for this class would be those of the present General class.

With regard to the requirement for Morse Code proficiency for operation below 30 MHz, I was interested to learn that the international agreements impose no particular speed requirement. I had been under the impression that a minimum proficiency of 5 words per minute was required.

Accordingly, I propose a blanket Morse Code requirement of 5 words per minute for all amateur license classes permitting operation below 30 MHz. This requirement would be rescinded upon international agreement at a future World Radiocommunications Conference. There should be no possibility of obtaining a waiver for this requirement. I point out that currently this level of proficiency is required before obtaining a waiver for higher speed Morse code requirements.

I offer this suggestion because I agree that the Morse Code is no longer the primary mode of communication. Other technologies have supplanted it. I also offer this suggestion because I believe it will eliminate current abuses in the obtaining of medical waivers for the high speed Morse Code requirements, which I believe are widespread and abhorrent.

It should be noted that this in no way limits those who enjoy Morse Code operation and who wish to pursue this interest. I also note that I have suggested stricter technical requirements in all license classes to ensure that operators who take advantage of relaxed code requirements do not also profit from relaxed requirements in other areas. New forms of digital communication should be part of the focus of this suggestion. That is not in the interest of a vital Amateur service.

The license class which would confer all Amateur privileges on all bands would be designated the Advanced class, a return to a status-quo-ante Incentive Licensing, which, in my view, unfairly deprived former Advanced Class

operators  
of band segments which they had fairly earned. This class would be a  
combination  
of the current Advanced and Extra class requirements in an examination of from  
60 to 75 questions. The Morse Code requirement would be as I have stated  
above:  
5 words per minute.

With regard to Volunteer Examination testing, I note that there are  
disparities between the various volunteer Examination Coordinators regarding  
the  
level of achievement required of examiners. In an amendment to their rules  
effective January, 1998, the ARRL-VEC prohibits its examiners from  
administering  
an examination for any element which the examiner has not passed him or her  
self.

Other VEC's permit their examiners to administer Morse Code  
tests when their examiners have not passed the element themselves, but instead  
hold medical waivers. I feel that this constitutes an unacceptable state of  
affairs, and leads to possible further abuses of the medical waiver option. I  
feel that all Volunteer Examination Coordinators must operate from the same  
set  
of rules, as set forth by the Commission.

I would also suggest that volunteer examiners may give exams for any elements  
which they have passed. Thus, General Class examiners may test Novice, Tech  
and  
Tech Plus. Advanced class may test for General and 13 words per minute Morse  
code.

Regarding abuses within the Amateur service, I feel that sufficient resources  
exist within the Amateur service to provide self enforcement. However, what is  
lacking is the authority to act, and reliable follow up by the Commission on  
matters brought to its attention. I call upon the Commission to draft a  
suitable  
reporting procedure.

I suggest that among those best able to initiate  
action against amateurs who are operating in violation of the Part 97 rules,  
and  
the general norms of gentlemanly behavior, are the Volunteer Examiners. In  
many  
cases these same people are also conducting classes for prospective amateurs.  
Other resources such as the Amateur Auxiliary should also be cultivated.

Regardless of the mechanism for observing and reporting, the Commission must  
be  
responsible for supporting the self-enforcement process. It must convey  
sufficient authority to observers to allow them to pursue abusive operators  
with  
the assurance that their efforts will be acted upon in an appropriate manner  
by  
the Commission.

I strongly object to the naming of the ARRL (American Radio Relay League) as  
the

primary body responsible for the organization of such observers. The ARRL is representative of only a small fraction of American amateurs. In my opinion, its agenda is too self serving to permit of its being used in so sensitive an area.

I suggest the Commission institute procedures for recruiting qualified, responsible observers. I suggest that the Commission, and the Commission only, be responsible for adding endorsements to the licenses of those whom it designates as observers. I feel that this responsibility should only be granted to those holding the highest license class. Those nominated should be subject to stringent review, and should be required to take special training, as determined by the Commission. No private amateur organization should be wholly in charge of observing and reporting abuses in the amateur service.

I support the Commission in this matter of restructuring the Amateur service. Amateurs have a fine reputation for innovation and public service. When all the new technological services are rendered useless because of natural disasters or other types of emergency, it will still be the ham with a make shift antenna who will be first on the air. We must act to make sure that tradition continues.

Respectfully submitted.

W8DMI  
Dan Karbginsky